

## **EXHIBIT C**

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE

UNITED STATES OF AMERICA

V.

CHESTER GALLAGHER; HEATHER IDONI;  
CALVIN ZASTROW; COLEMAN BOYD;  
PAUL VAUGHN; DENNIS GREEN

)  
)  
)  
) NO. 3:22-CR-00327  
) JUDGE TRAUGER  
)  
)  
)

DECLARATION OF [REDACTED]

I, [REDACTED], declare as follows:

1. I am over the age of 18 and have personal knowledge of the matters set forth in this Declaration.

2. I am a Board Certified and practicing obstetrician/gynecologist.

3. In March 2021, I practiced at the Mount Juliet, Tennessee location of carafem.

4. I was working in the clinic when the Defendants blockaded the entrances. I felt afraid for my safety that day. The Mount Juliet police arrested about a dozen OSA members and their children that day because they refused to leave the building.

5. I currently work at a public institution. As a public servant, my records are subject to public records requests. Beginning from shortly after I began working here, anti-abortion extremists have requested my HR file and my emails through the state's public records act.

6. I am concerned that if I am disclosed as a testifying witness in this criminal trial, Defendants' supporters will harass and harm me at my work and my home.

I provide the foregoing Declaration pursuant to 28 U.S.C. § 1746 and penalty of perjury.

Dated: January 5, 2024

[REDACTED]

1/8/2024

[REDACTED]